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Attorneys for Plaintiff

Johnson & Johnson Health Care Systems Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON

HEALTH CARE SYSTEMS INC.,

Plaintiff,

vs.

SAVE ON SP, LLC,

Defendant.

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Civil Action No. 22-2632(JKS)(CLW)

Hon. Jamel K. Semper, U.S.D.J.

Hon. Cathy L. Waldor, U.S.M.J.

Hon. Freda L. Wolfson, Special Master

NOTICE OF MOTION TO SEAL

COUNSEL:

PLEASE TAKE NOTICE that on October 7, 2024 at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”) will apply

before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order, to (a) permanently maintain under seal the letters and supporting exhibits filed by counsel for the parties regarding Defendant Save On SP, LLC's Motion to Compel Discovery from "Janssen Market Research," dated May 21, 2024, with related briefing on May 31 and June 7, 2024 (ECF Nos. 330, 331 & 357 filed July 3, 2024 and August 27, 2024); and (b) permit JJHCS to file the proposed public versions of ECF Nos. 330, 331 & 357, attached as Exhibit A to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion ("Greenbaum Declaration").

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and indices in support of Motion to Seal. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

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By: s/ Jeffrey J. Greenbaum
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Dated: August 27, 2024